

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

**Michael DeWayne Nolan and
Linda Raye Nolan**

Debtors

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CASE NO.: 1:22-bk-01932-HWV

**MOTION FOR EXTENSION OF TIME TO FILE SUMMARY OF ASSETS AND
LIABILITIES AND CERTAIN STATISTICAL INFORMATION, DECLARATION
ABOUT AN INDIVIDUAL DEBTOR'S SCHEDULES, SCHEDULES A-J, STATEMENT
OF FINANCIAL AFFAIRS, STATEMENT OF CURRENT MONTHLY INCOME AND
CALCULATION OF COMMITMENT PERIOD, CALCULATION OF YOUR
DISPOSABLE INCOME, DISCLOSURE OF COMPENSATION OF ATTORNEY FOR
DEBTOR, AND CHAPTER 13 PLAN**

AND NOW COMES, Michael DeWayne Nolan and Linda Raye Nolan, Debtors, by and through her attorneys, Jacobson, Julius & Harshberger, who file this Motion to Extend the Completion Date of Bankruptcy Documents, and in support thereof states as follows:

1. Debtors filed for relief under Chapter 13 of the bankruptcy code on October 6, 2021.
2. Per the Bankruptcy Code, copies of Summary of Assets and Liabilities and Certain Statistical Information, Declaration About an Individual Debtor's Schedules, Schedules A-J, Statement of Financial Affairs, Chapter 13 Statement of Current Monthly Income and Calculation of Commitment Period, Chapter 13 Calculation of Your Disposable Income, Disclosure of Compensation of Attorney for Debtor, and a Chapter 13 Plan are to be filed within fourteen (14) days of initial filing of the petition.
3. Debtors property was subject to sheriff's sale and the immediate filing of the bankruptcy to protect the property was needed. Nevertheless, Debtors have not been able to provide all the documents necessary to complete the filing correctly.

4. Debtors requests an additional ten (10) days with the new due date being October 30, 2022 to file the required documentation.

WHEREFORE, Debtors, through counsel, respectfully request this honorable court grant their Motion to Extend allowing Debtors to file all required documentation on or before October 30, 2022.

Respectfully Submitted,

Date: October 20, 2022

JACOBSON, JULIUS & HARSHBERGER

/s/ Chad J. Julius

Chad J. Julius, ID # 209496

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CERTIFICATE OF SERVICE

I, Dera Shade, paralegal with Jacobson, Julius & Harshberger, hereby certify that I have served a copy of the foregoing MOTION FOR EXTENSION OF TIME TO FILE on the following person(s) by E-Service, addressed to:

US TRUSTEE

CHAPTER 13 TRUSTEE
JACK N. ZAHAROPOULOS
8125 ADAMS DRIVE SUITE A
HUMMELSTOWN, PA 17036

/s/Dera Shade
Dera Shade, Paralegal
Jacobson, Julius & Harshberger
8150 Derry Street
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Dated: October 20, 2022

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ORDER

Upon Consideration of the Debtors' Motion for Extension of Time to File Summary of Assets and Liabilities and Certain Statistical Information, Declaration About an Individual Debtor's Schedules, Schedules A-J, Statement of Financial Affairs, Statement of Current Monthly Income and Calculation of Commitment Period, Calculation of Your Disposable Income, Disclosure of Compensation of Attorney for Debtor, and Chapter 13 Plan, IT IS HEREBY ORDERED AND DECREED that the deadline for filing the aforementioned documents in the above captioned case is extended to October 30, 2022.